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John Blatz
Vice President
Environment, Health and Safety

One Great Lakes Boulevard
West Lafayette, IN 47906 USA
P.O. Box 2200
West Lafayette, IN 47996-2200 USA



June 15, 2001

OPPT Document Control Office (DCO)
East Tower Room G-099
Waterside Mall
401 M Street, SW
Washington, DC 20460

RE: OPPTS-00274D: Voluntary Children's Chemical Evaluation Program

Dear Sir or Madam:

Great Lakes Chemical Corporation (GLCC) is submitting this letter in response to Christine Todd Whitman's May 31st letter to Mark Bulriss, CEO of GLCC. GLCC wishes to express our intention to sponsor three chemicals under Tier 1 of EPA's Voluntary Children's Chemical Evaluation Program (VCCEP) pilot (65 Fed. Reg. 81700, Dec. 26, 2000).

We are strongly committed to environmental stewardship of our products, many of which are flame retardants used preventatively by our customers to avoid disastrous human health and environmental consequences associated with fires. Of the four chemicals produced by GLCC that are named in VCCEP, three are used only as flame retardants in high risk end uses, such as home furnishings and consumer electronics. Accordingly, while this initiative is focused on long term children's risks from exposure to chemicals, EPA should recognize that the end uses for these particular chemicals reduce the risk of injury or death from accidental fires at home, in public facilities and while traveling. Children in particular are the victims of these types of fires. These flame retardants also avoid the significant pollution of air, water and solid waste streams caused by accidental fires. Accordingly, we intend to incorporate these positive aspects in the evaluating the overall risks of these compounds to children.

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Telephone: (1) 765 497 6103
Facsimile: (1) 765 497 5477
E-mail: jblatz@glcc.com
www.greatlakes.com

We applaud EPA's efforts to fill data gaps by voluntary industry initiatives, such as VCCEP. GLCC has participated in other voluntary initiatives in the past. We also agree that where possible, sharing of costs within consortia of companies is the best way to obtain data without undue financial impacts. In fact, GLCC is participating in an American Chemistry Council Chemstar panel with respect to one of the four substances (decabromodiphenylether; CAS 1163-19-5). However, it is important to note that GLCC is the sole US based producer or importer of the three other listed chemicals. Consortium formation is not a likely option at this time for these chemicals.

Despite the lack of cost sharing opportunities through consortia, our commitment covers all three flame retardant substances. We base this commitment on the fact that typical products that use these substances could be found in a child's or prospective parent's environment. With respect to the remaining chemical (ethylene dibromide), we are opting not to undertake testing, because, as explained below, the chemical is no longer used in the U.S. by GLCC or its customers, except as a manufacturing intermediate in enclosed processes.

The following table provides the information regarding the sponsored chemicals.

Sponsored Chemical for VCCEP Pilot – Tier 1

Chemical	CASRN	Start Date	Submission Date*
Decabromodiphenylether	1163-19-5	No later than 12-15-01	6-25-03 to 10-25-03
Pentabromodiphenylether	32534-81-9	No later than 12-15-01	Between 7/1 and 12/31/02
Octabromodiphenylether	32536-52-0	No later than 12-15-01	Between 7/1 and before 12/31/02

- * The start date is intended to allow GLCC to attend EPA-sponsored workshops on exposure requirements before undertaking significant efforts in that area. We understand that EPA currently contemplates three such workshops extending into the fall of this year. A range is stated in the submission date because of uncertainties concerning the requirements of the program, particularly as they pertain to exposure information.

The submission dates for the Penta and Octabromodiphenylethers are based on the anticipation that we will "read across" data from one brominated diphenylether to another if data gaps exist, which both shortens the time line and minimizes additional animal testing. Great Lakes is committing to support the Tier 1 requirements of the VCCEPP for Octa and Pentabromodiphenylether, and will work cooperatively with the EPA to initiate regulatory action to conduct further testing needed for the Tier 2 or later Tier 3 assessments (should these be needed). GLCC favors a regulatory, rather than voluntary, approach in this case due to the fact that we are the sole US producer of Penta and Octabromodiphenylethers. Voluntary sponsorship of these higher tier assessments by Great Lakes as the sole sponsor might encourage others to import or begin production in the US market, and we wish to preserve our ability to receive compensation in that event.

As mentioned above, GLCC is involved in the production/import of one additional substance listed on the VCCEP pilot list that we do not intend to sponsor. Ethylene dibromide (EDB) is used and sold by GLCC in the U.S. only as a chemical intermediate for use in closed processes. The phase out of leaded fuels and the revocation of EDB pesticide registrations has dramatically reduced EDB consumption in the US, and has eliminated both of these emissive uses. Risks from these and other historic uses of EDB should be evaluated on a site by site basis in the context of environmental remediation, with consideration of local air, land, water and resource utilization. Under these circumstances we do not believe that EDB is a good candidate to evaluate under the VCCEP PILOT.

We understand that sponsoring a substance in Tier 1 of the VCCEP pilot means that GLCC has made a voluntary commitment consistent with the requirements of Tier 1 of the pilot program. As stated in EPA's announcement of the pilot program, since commitments are not enforceable agreements or contracts, GLCC is hopeful that all parties will work cooperatively to make this initiative successful.

GLCC's technical contact for this activity is:

Robert Campbell
Great Lakes Chemical Corporation
1801 Highway 52 NW
West Lafayette, IN 47906
Phone: 765-497-6173
Fax: 765-497-5923
Email: rcampbel@glcc.com

Please contact Mr. Campbell if you have any questions regarding this commitment.

Sincerely yours,



John Blatz
Vice President, Corporate EHS

Cc: R. Campbell
Mark Bulriss
Fred Webber –American Chemistry Council
C. Whitman – US EPA